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Ellen Garvey
Executive Officer/
Air Pollution Control Officer

Mr. Dave Howekamp
Director, Air Management Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

RE: East Bay Municipal Utility District – Plant #591
Application #17883, Minor Modification of Title V Permit

Dear Mr. Howekamp:

This is to advise you that the Bay Area Air Quality Management District has made minor modifications to the Major Facility Review Permit for East Bay Municipal Utility District (EBMUD) – Plant #591.

In Permit Application #17883, EBMUD requested a wording change to their permit conditions (Condition #278) to allow the operation of (1) IC engine simultaneously with (1) boiler (instead of all the boilers operating together or 2 of the 3 IC engines operating together). District staff has concluded that there will be no increase of emissions from this modification because the highest potential emission rates for NOx and CO from a single boiler will always be comparable to or less than the actual NOx and CO emission rates from an IC engine operating at the same fuel firing rate. A letter inviting comments on the proposed permit changes was sent to your attention in February of this year for a 45 day comment period. The District received no comments.

In addition to the specified permit condition wording change, administrative amendments were made to the permit to reflect the federal enforceability of District Regulation 9, Rules 7 and 8 which have recently been approved by the EPA into the State Implementation Plan (SIP). This action is also deemed to be a minor permit modification because sufficient monitoring is currently in place for the boilers and IC engines to meet federal monitoring requirements.

A copy of the modified Major Facility Review Permit is enclosed for your records. If you have any questions on this matter, please call **Ted Hull, Air Quality Engineer II at (415) 749-4919**.

Very truly yours,

Ellen Garvey
Executive Officer
Air Pollution Control Officer

EJG:WDB:RTH
enclosure